

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**LIBERTARIAN NATIONAL
COMMITTEE, INC.,**

Plaintiff,

v.

**MIKE SALIBA, RAFAEL WOLF,
GREG STEMPELE, ANGELA
THORNTON-CANNY, JAMI
VAN ALSTINE, MARY
BUZUMA, DAVID CANNY,
and JOSEPH BRUNGARDT,**

Defendants.

Case No. 23-cv-11074

Hon. Judith E. Levy

DECLARATION OF BRIAN ELLISON

Under 28 U.S.C. § 1746, I, Brian Ellison, declare as follows under penalty of perjury:

1. I am over the age of 18, of sound mind, and otherwise competent to provide this declaration.

2. I am a member of the Libertarian Party of Michigan (LPM) and ran as LPM's candidate for lieutenant governor during the 2022 gubernatorial election.

3. I currently serve on the LPM executive committee as the representative from District 5, which covers counties on and near Michigan's southwestern border.

I was elected to that position at LPM's April 2023 convention in Lansing.

4. I believe that Mike Saliba and the other individuals listed at the following website, <https://michiganlp.net/about-us/leadership/> (collectively, the “elected leadership”), are the legitimate and rightfully elected leaders of the LPM.

5. I have supported the elected leadership in the governance dispute with Andrew Chadderdon in a number of ways, including by: (1) donating to LPM’s legal defense fund; and (2) encouraging others to do so in posts on social media. The LPM legal defense fund was created to raise money for legal expenses relating to the governance dispute.

6. On February 10, 2023, I donated \$250 to LPM’s legal defense fund through a PayPal.com link sent to me by email by a member of the elected leadership.

7. At the time, I was aware that the LNC executive committee had met in executive commission five days earlier to discuss the LPM governance dispute, and was aware that it was likely to side with Andrew Chadderdon due to his affiliation with the Mises Caucus.

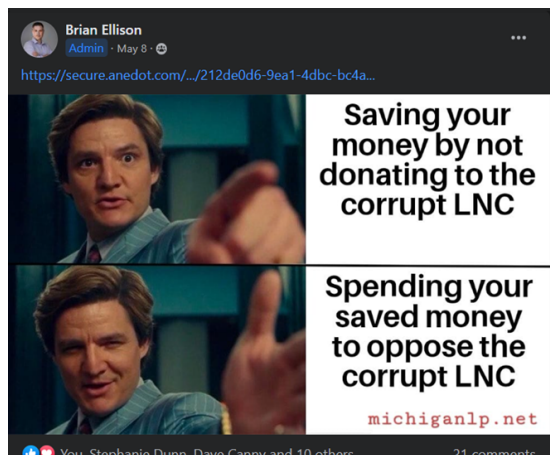
8. I decided to donate to the LPM legal defense fund in part because I wished to assist the elected leadership in contesting any interference from the LNC in an intraparty governance dispute within a state-level affiliate. I believe that LNC interference with the affairs of state-level affiliates is contrary to article 5, section 5 of the bylaws of the Libertarian Party, which states: “The autonomy of the affiliate and

sub-affiliate parties shall not be abridged by the National Committee or any other committee of the Party, except as provided by these bylaws.”

9. In addition to my personal donation, I have made several posts on Facebook asking others to donate to the LPM legal defense fund, a sampling of which are shown below.

10. In part because of my 2022 candidacy for lieutenant governor, I have a significant following on social media that includes members of the Libertarian Party and its state-level affiliates both inside and outside of the state of Michigan.

11. On May 8, three days after the LNC filed the complaint in this case, I posted the following on social media. The link at the top of the post is a link to the LPM legal defense fund’s payment page hosted through anedot.com. Visitors to that page can make electronic donations to the LPM legal defense fund.



12. On that same day, I made the following posts on Twitter. These posts also contained a link the LPM legal defense fund payment page on anedot.com.



13. The second of these posts references a post made by Angela McArdle in June 2021, a year before she became chair of the LNC.

14. In posting these items, it was my intent that anyone who read them would understand that they were being asked to donate to cause (*i.e.*, support for the LPM's elected leadership) that was not supported by — and was in fact antagonistic to — the LNC.

15. I am not aware of anyone who was confused by my posts.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 6-30-23


Brian Ellison